

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, D.C. 20268-0001

RETAIL ACCESS OPTIMIZATION INITIATIVE, 2011

Docket No. N2011-1

**RESPONSES OF THE UNITED STATES POSTAL SERVICE
TO DAVID POPKIN INTERROGATORIES DBP/USPS-39 THROUGH 49**

The United States Postal Service hereby provides institutional responses to the above-listed interrogatories of David Popkin dated August 17, 2011. Each interrogatory is stated verbatim and followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

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**RESPONSE OF UNITED STATES POSTAL SERVICE
TO INTERROGATORY OF DAVID POPKIN**

DBP/USPS-39 The Postal Service has established various criteria for those facilities that are being considered for discontinuance or consolidation.

- [a] Does the listing of facilities being considered represent 100-percent of those facilities that meet the criteria?
- [b] If not, please advise the approximate number of facilities that are not on the list even though they meet the criteria for inclusion.
- [c] If not, please provide the reasons why these facilities were not included on the list.

RESPONSE

(a-c) The list is intended to identify the facilities that meet the criteria.

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DBP/USPS-40

- [a] Approximately what percentage of the facilities that are being considered for discontinuance or consolidation utilize a POS terminal?
- [b] Please provide a breakdown of the other types of accounting terminals that are in use at the facilities on the list.

RESPONSE

- (a) Approximately 18 percent.
- (b) The others types of terminals are either Integrated Retail or Electronic Money Order Voucher System.

**RESPONSE OF UNITED STATES POSTAL SERVICE
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DBP/USPS-41 Please refer to the response to Interrogatory PR/USPS-T1-13 subparts [a] through [e].

- [a] Please confirm, or explain if you are unable to confirm, that the response in each of these five subparts of “None.” indicates that there are no facilities on the list for consideration for discontinuance or consolidation that are co-located with the type of unit/facility specified.
- [b] Please provide a similar response for an HCR delivery unit.
- [c] If your response to subpart [b] is also “None.”, please confirm, or explain if you are unable to confirm, that all of the facilities on the list have only post office box delivery at their facility.

RESPONSE

- (a) That was the intent of the response.
- (b) It is not clear what an HCR delivery unit refers to. Mail delivery to other than Post Offices boxes, whether by letter carrier or highway contract driver, whether to a residential mail receptacle or a non-personnel unit, is a matter outside the scope of this proceeding, since no changes in carrier or HCR delivery service are being proposed. NPUs are not co-located with Post Offices, stations or branches.
- (c) N/A

**RESPONSE OF UNITED STATES POSTAL SERVICE
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DBP/USPS-42 Please refer to your response to Interrogatory DBP/USPS-28. Since the hypothetical presented would be possible to utilize and would eliminate the inconvenience of the affected customers of a discontinuance or consolidation to have to go through the process of address change notification, please provide the conditions under which this concept would or would not be utilized.

RESPONSE

It could be utilized in circumstances deemed appropriate by the Postal Service on a case-by-case basis.

**RESPONSE OF UNITED STATES POSTAL SERVICE
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DBP/USPS-43 Please refer to your response to Interrogatory DBP/USPS-29 subpart [c] as it applies to Approved Shippers.

- [a] Please provide a listing of the types of mail that may be accepted by an Approved Shipper.
- [b] Please provide a listing of the types of mail that may not be accepted by an Approved Shipper.
- [c] Do all Approved Shippers sell postage?
- [d] If not, approximately what percentage do?
- [e] Please advise the denominations and format of the postage that is sold.
- [f] Do all Approved Shippers sell packaging?
- [g] If not, approximately what percentage do?

RESPONSE

- (a) Domestic and international retail shipping and mailing services may be offered (not required) including GXG, Express Mail, Priority Mail, First-Class Mail, Parcel Post, with Certified, Insurance, Signature Confirmation and Delivery Confirmation and Return Receipt.
- (b) Registered Mail service or other services where only USPS employees must validate receipt, such as Certificate of Mailing.
- (c) Yes, a postage account is required and postage is applied to items via meter label or PC Postage label.
- (d) N/A
- (e) Postage is applied via meter or PC Postage labels and the postage value/denomination is determined by the weight, zone/destination, size and packaging/flat-rate of the item being mailed.
- (f) Many provide complimentary Express and Priority Mail packaging.

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RESPONSE to DBP/USPS-43 (continued)

- (g) The percentage is not known, but it is estimated that an overwhelming majority sell some form of packaging.

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DBP/USPS-44

Please refer to your response to Interrogatory DBP/USPS-29 subpart [c] as it applies to Consignment operations.

- [a] Please confirm, or explain if you are unable to confirm, that Consignment Operators do not accept mail nor provide any other postal service except the selling of postage stamps.
- [b] Please advise the denominations and format of the postage that is sold.

RESPONSE

- (a) Confirmed.
- (b) Among all locations, Forever Stamp booklets, rolls and booklets are sold, but each format is not sold at every location.

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DBP/USPS-45 Please refer to your response to Interrogatory DBP/USPS-30. Please explain why the revenue figure that was utilized in determining whether a specific facility is to be studied for discontinuance of consolidation is limited to revenue that requires interaction with or activity by retail window personnel who perform work associated with the mail or service in question.

RESPONSE

The objective was to focus on offices that could be determined to have "low earned workload" based on retail activity, as opposed to other activity not related to retail.

**RESPONSE OF UNITED STATES POSTAL SERVICE
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DBP/USPS-46 Please refer to your response to Interrogatory DBP/USPS-32.

- [a] Please provide copies of any guidelines, either in the Domestic Mail Manual or at the Headquarters level, regarding whether or not retail window service should be provided on Saturdays.
- [b] Please confirm, or explain if you are unable to confirm, that if a facility that is discontinued or consolidated has Saturday retail window service and the Alternate Access Site being considered does not have Saturday service, the discontinuance will have an even greater effect on the customers of the discontinued facility.

RESPONSE

- (a) Postal Operations Manual section 126.412 states:

Window service is provided on Saturdays if there is a demonstrated need. At financial units serving business areas or facilities serving communities where residents leave on weekends, retail service may be closed if service is available at other postal units, at contract stations, or by self-service equipment. Postmasters must post signage informing customers of locations and hours of such services.

- (b) It could be perceived that way by those who depend significantly on the availability of Saturday postal retail hours at the discontinued site and are unable or unwilling to either adjust their postal retail habits or utilize alternative channels of access.

**RESPONSE OF UNITED STATES POSTAL SERVICE
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DBP/USPS-47 Please refer to your response to Interrogatory DBP/USPS-20.

[a] Will any special consideration be given to the collection times since the collection box is located in front of a postal facility?

[b] If not, why not?

RESPONSE

Please again review the response to DBP/USPS-20. A VPO is a non-postal facility at which certain postal products and services can be obtained. Accordingly, a collection box in front of a VPO is not a collection box "in front of a postal facility."

**RESPONSE OF UNITED STATES POSTAL SERVICE
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DBP/USPS-48 Please refer to your response to Interrogatory DBP/USPS-26. For a Village Post Office, does the Postal Service pay the contractor or receive payment from the contractor?

RESPONSE

Yes. Please see the response to Question 12 of POIR 1.

**RESPONSE OF UNITED STATES POSTAL SERVICE
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DBP/USPS-49 Please refer to your response to Interrogatory DBP/USPS-27. Which of the columns in the chart provided in response to Interrogatory DBP/USPS-6 apply to the services provided by a Village Post Office? If necessary, please provide a separate chart showing the available services at a Village Post Office compared to an independent post office and classified station/branch. Furthermore, provide complete information when the full service of a given category is not provided such as the acceptance of Priority Mail Flat-Rate containers only or the sale of full “units” of Forever Stamps only.

RESPONSE

Please see the response to Question 10 of POIR 1.